

UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA
Cr. No. 21-173 (PJS/DTS)

UNITED STATES OF AMERICA,)
)
Plaintiff,)
)
v.)
)
GISELA CASTRO MEDINA (2),)
)
Defendant.)

**DEFENDANT'S MOTION TO
LEAVE HALFWAY HOUSE
FOR THANKSGIVING DAY**

The purpose of this motion is to request that Ms. Medina be permitted to leave the halfway house for Thanksgiving on Thursday, November 25, 2021 from 9:00 a.m. to 8:00 p.m. to spend the day with her family at her parents' home. Pretrial Services Officer Michael Alberts *supports* this motion. Assistant U.S. Attorney Laura Provinzino defers to Mr. Alberts' position on the matter and does *not* object.

On September 23, 2021, the Honorable Becky R. Thorson set conditions of release in Ms. Medina's case (ECF No. 52). The conditions include home detention at a halfway house (*id.* at p. 3).

Ms. Medina now moves this Court to allow her to leave the halfway house to spend Thanksgiving day with her family at her parents' house. The undersigned has spoken with Pretrial Services Officer Michael Alberts, who stated that he *supports* the motion with certain conditions as follows:

1. Ms. Medina is permitted to be away from her halfway house on Thursday, November 25, 2021 from 9:00 a.m. to 8:00 p.m.

2. Ms. Medina shall leave the halfway house no earlier than 9:00 a.m. and go to her parents' house. She shall be back at the halfway house no later than 8:00 p.m. Ms. Medina shall not make any unapproved stops during transit.
3. If any alcohol is present or any minors other than her sister arrive, Ms. Medina shall immediately leave and return to the halfway house.
4. Ms. Medina shall call the halfway house when she arrives at her parents' house and shall respond to their calls as directed by the halfway house.
5. All other pretrial release conditions remain in effect.

Mr. Alberts also spoke with the halfway house to ensure their allowance for this request.

Assistant U.S. Attorney Laura Provinzino defers to Mr. Alberts and does not object.

Respectfully submitted,

RYAN GARRY, ATTORNEY, LLC

Dated: November 24, 2021

s/ Elizabeth Duel

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